



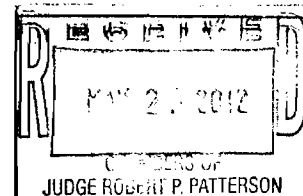
Davis Wright  
Tremaine LLP

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>5/25/12</u>

1633 Broadway  
27th Floor  
New York, NY 10019-6708  
  
Christopher Robinson  
212.603.6441 (tel)  
212.379.5248 fax  
  
christrobinson@dwt.com

May 25, 2012

VIA FACSIMILE (212) 805-7917



Hon. Robert P. Patterson, Jr.  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2550  
New York, NY 10007-1312

*Re: Levin v. Bank of New York, et al. – 09 Civ. 5900 (RPP) (S.D.N.Y.)*

Dear Judge Patterson:

We represent defendant Citibank, N.A. ("Citibank") in the above-captioned proceeding. We write in connection to the motion filed by the co-defendant banks JP Morgan Chase & Co., JP Morgan Chase Bank, N.A., The Bank of New York Mellon (and subsequently joined by Societe Generale) (the "Motion") which seeks to serve additional third-party complaints against holders of judgments against Iran who have recently served the banks with writs or other process indicating a potential interest in the assets at issue in this matter. Citibank has also been served with such writs and hereby joins the Motion of co-defendant banks to the extent indicated below.

Since Citibank served and filed its third-party complaints with respect to Phase Two Assets in the Fall of 2011, it has been served with writs by additional holders of judgments against Iran, namely: *Murphy v. Islamic Republic of Iran*, 06-cv-596 (RCL) (D.D.C.); *Kirschenbaum v. Islamic Republic of Iran*, 03-cv-01708 (RCL) (D.D.C.); *Kirschenbaum v. Islamic Republic of Iran*, 08-cv-1814 (RCL) (D.D.C.); *Beer v. Islamic Republic of Iran*, 06-cv-473 (RCL) (D.D.C.); and *Beer v. Islamic Republic of Iran*, 08-cv-01807 (RCL) (D.D.C.). All but one of these groups of judgment creditors are represented by counsel who have already made an appearance in this action. While the request for leave to interplead the Murphys is common to all co-defendant banks, the Beers and Kirschenbaums appear to have served Citibank only.

Anchorage  
Bellevue  
Los Angeles

New York  
Portland  
San Francisco

Seattle  
Shanghai  
Washington, D.C.

[www.dwt.com](http://www.dwt.com)

Hon. Robert P. Patterson, Jr.  
May 25, 2012

Page 2

Accordingly, Citibank hereby joins the Motion for leave to file additional third-party complaints on the terms set forth in the proposed order attached thereto, except it does so with respect to the above-named judgment holders. ~~Beck and Patterson~~

Respectfully submitted,

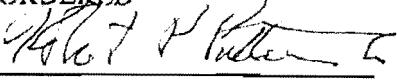


Christopher J. Robinson

CJR/lp

May 25, 2012

SO ORDERED

  
\_\_\_\_\_  
U.S.D.J.